SIDLEY AUSTIN LLP
SIDLEY

SIDLEY AUSTIN LLP
1501 K STREET, N.W.
WASHINGTON, D.C. 20005
(202) 736 8000
(202) 736 8711 FAX

tvanwazer@sidley.com
(202) 736-8119

BEIJING GENEVA SAN FRANCISCO
BRUSSELS HONG KONG SHANGHAI
CHICAGO LONDON SINGAPORE
DALLAS LOS ANGELES TOKYO
FRANKFURT NEW YORK WASHINGTON, D.C.

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October 22, 2007

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, N.E.
Suite 110
Washington, DC 20002

Re: Ex Parte Presentation
Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television,
MB Docket No. 07-91

Dear Ms. Dortch:

On Friday October 19, 2007, Andy Bater of Tribune Broadcasting Company ("Tribune") and the undersigned met with the following Commission personnel: Eloise Gore, Nazifa Sawez, Gordon Godfrey, John Gabrysch, Kevin Harding, Evan Baranoff, Shaun Maher and Kim Matthews.

Among other things, the parties reviewed the attached materials that detailed the steps to be undertaken by Tribune to build-out the post-transition DTV facilities of KTXL-DT, Sacramento, California. The licensee of KTXL-DT is an indirect, wholly-owned subsidiary of Tribune. The parties also discussed several related issues raised in the FCC's NPRM and addressed in Tribune's comments in the above-referenced proceeding. These issues included the Commission's proposed five-factor test to review and analyze requests to reduce analog service prior to February 17, 2009, the need for FCC action on minor modifications to regularize service areas prior to the purchase of post-transition DTV antennas by stations and the level of cooperation among FCC licensees to accommodate post-transition DTV build-outs.

As required by the FCC's rules, one copy of this letter is being filed electronically in the above-referenced docket. Please direct any questions regarding this matter to the undersigned.

Sincerely,

Thomas Van Wazer

Thomas P. Van Wazer

Attachments

cc: Eloise Gore (via e-mail)
Nazifa Sawez (via e-mail)
Gordon Godfrey (via e-mail)
John Gabrysch (via e-mail)
Kevin Harding (via e-mail)
Evan Baranoff (via e-mail)
Shaun Maher (via e-mail)
Kim Matthews (via e-mail)

Tribune Broadcasting
KTXL-DT Transition Parameters
(As of 10/19/07)

Baselines

Current Analog Service

Based on an OET-69 analysis using 2000 Census data, the licensed KTXL Channel 40 antenna with 5,000 kW maximum ERP and 597 m HAAT provides terrain-limited, interference-free service to a population of 3,956,198.

Current DT Service

Based on an OET-69 analysis using 2000 Census data, the licensed KTXL Channel 55 antenna with 1,000 kW maximum ERP and 581 m HAAT provides terrain-limited, interference-free service to a population of 4,714,447.

DT Allotment (Appendix B)

Based on an OET-69 analysis using 2000 Census data, the KTXL Channel 40 'Appendix B' Allotment facility with 765 kW maximum ERP and 581 m HAAT would provide terrain-limited, interference-free service to a population of 4,587,498.

Current Tower Configuration

KTXL operates from the same tower as KVIE(TV). KTXL uses a top-mounted analog channel 40 antenna. KVIE uses a side-mounted, analog channel 6 antenna lower on the tower. The pre-transition DTV antennas of KTXL and KVIE are mounted on the tower between the top-mounted KTXL and side-mounted KVIE analog antennas. See Tower Diagram.

Tribune Broadcasting
KTXL-DT Expected Transition Timeline/Steps
(As of 10/19/2007)

Fall 2007

- Complete coordination with KVIE regarding temporary installation of side-mounted channel 40 antenna
- Finalize final DTV antenna design with manufacturer, submit order

Note: Tribune is unable to find an antenna that precisely fits the allocation contour. See map. Impact of this is discussed below.

Summer 2008

- Install temporary, side-mounted channel 40 antenna rented from manufacturer
- Connect existing KTXL waveguide (specific type of transmission line) to temporary antenna
- Commence analog operations using temporary, side-mounted antenna

Analog Service With Temporary Analog Antenna

Antenna to be borrowed is expected to be a DCA, TFU-16DSB-M(C) model mounted at 503 m (1650 ft) AGL. The antenna would be oriented at 80 degrees true. With an average input power of 19 kW, we estimate a peak visual input power of 25 kW (with 10% aural). This would produce a maximum effective radiated power of 760 kW. Assuming 1,850 ft of WR1500 waveguide, the transmission efficiency would be 79%. This results in an estimated peak visual transmitter power output ("TPO") of 31.6 kW.

Based on an OET-69 analysis using 2000 Census data, the temporary Channel 40 analog antenna with 760 kW ERP and HAAT of 503 m would provide terrain-limited, interference-free analog service to a population of 2,858,449 or 72% of the current analog interference free service population.

Pre-Transition DTV Construction

- Remove existing top-mounted, analog channel 40 pylon antenna
- Stack new top-mounted DTV KTXL antenna and new KVIE DTV antenna (TBD)
- Restress guy wires etc.
- Connect waveguide back into the new KTXL DTV antenna
- After steps 1-4 are completed, remove side-mounted temporary channel 40 antenna

Analog Service Using New DTV Antenna

A maximum ERP of 4,250 kW would be permitted so that there would be no extension of the predicted Grade B contour beyond the licensed contour. For this ERP, the required TPO is calculated to be 113 kW.

However, from a power handling perspective, the maximum analog ERP is limited to 3,000 kW due to an antenna input power limitation. With the antenna gain and transmission system efficiency, the TPO is estimated to be 80 kW.

Tribune Broadcasting
KTXL-DT Expected Transition Timeline/Steps
(As of 10/19/2007)

Based on an OET-69 analysis using 2000 Census data, the Channel 40 DTV antenna with 3,000 kW ERP and 612 m HAAT would provide terrain-limited, interference-free analog service to a population of 3,408,006 or 86% of the current analog interference free service population.

Late Fall 2008

- Split existing channel 40 analog transmitter in half
- Configure one cabinet for DTV, leave one cabinet for analog

Analog Service Using New DTV Antenna With Half The Analog Transmitter

The estimated available TPO for one cabinet of the transmitter is 60 kW. This will allow for a maximum ERP of 2,250 kW.

Based on an OET-69 analysis using 2000 Census data, the Channel 40 antenna with 2,250 kW ERP and an 612 m HAAT would provide terrain-limited, interference-free analog service to a population of 3,332,499 or 84% of the current analog interference free service population.

February 18th 2009

Digital Service Using New DTV Antenna With Half The Ultimate Digital Transmitter

Using the reconfigured cabinet of the transmitter, a DTV ERP of 940 kW would be produced with a TPO of 25 kW. However, from a regulatory standpoint, the ERP will be limited to 640 kW so that there is no extension beyond the DTV allotment service contour. This ERP can be achieved with a DTV TPO of 17 kW.

Based on an OET-69 analysis using 2000 Census data, the Channel 40 antenna with 640 kW DTV ERP and 612 m HAAT would provide terrain-limited, interference-free service to a population of 4,277,250 or 93% of the appendix B, post-transition DTV service population.

Post-Transition DTV Construction

Spring/Summer 2009

- Convert other half of the transmitter
- Cutover transmission line from pre-transition DTV channel 55 antenna to new antenna
- Remove waveguide
- Remove KTXL's pre-transmission DTV channel 55 antenna
- Remove KVIE's analog channel 6 antenna
- Final restress/tensioning on tower

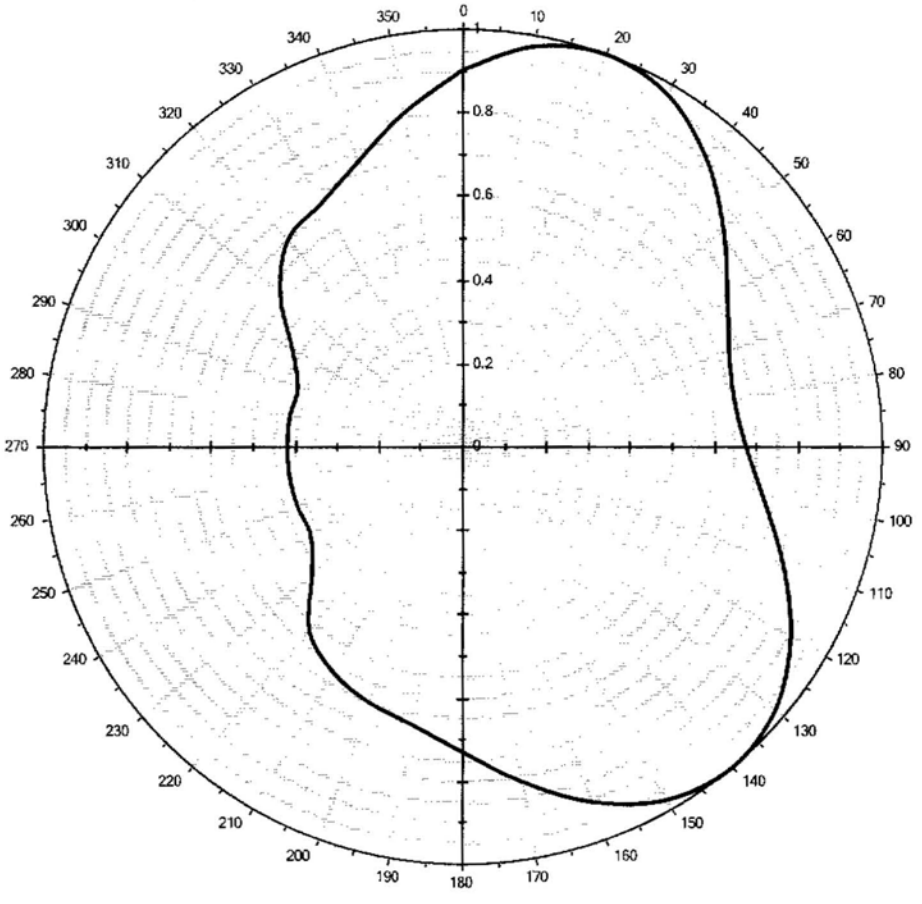
Note, Tribune anticipates that some off-air or reduced power operation will be needed during construction to RF safety issues. Actual impact to air operations is TBD pending final DTV antenna configurations.

DA Inquiry

du Treil, Lundin, & Rackley, Inc., Sarasota, Florida

Antenna Pattern: ***Antenna ID:*** 70334

KTXL-DT, SACRAMENTO, CA
APPENDIX B ALLOTMENT PATTERN
CHANNEL 40, 765 KW(MAX), 581 M
38-16-18 NL / 121-30-18 WL



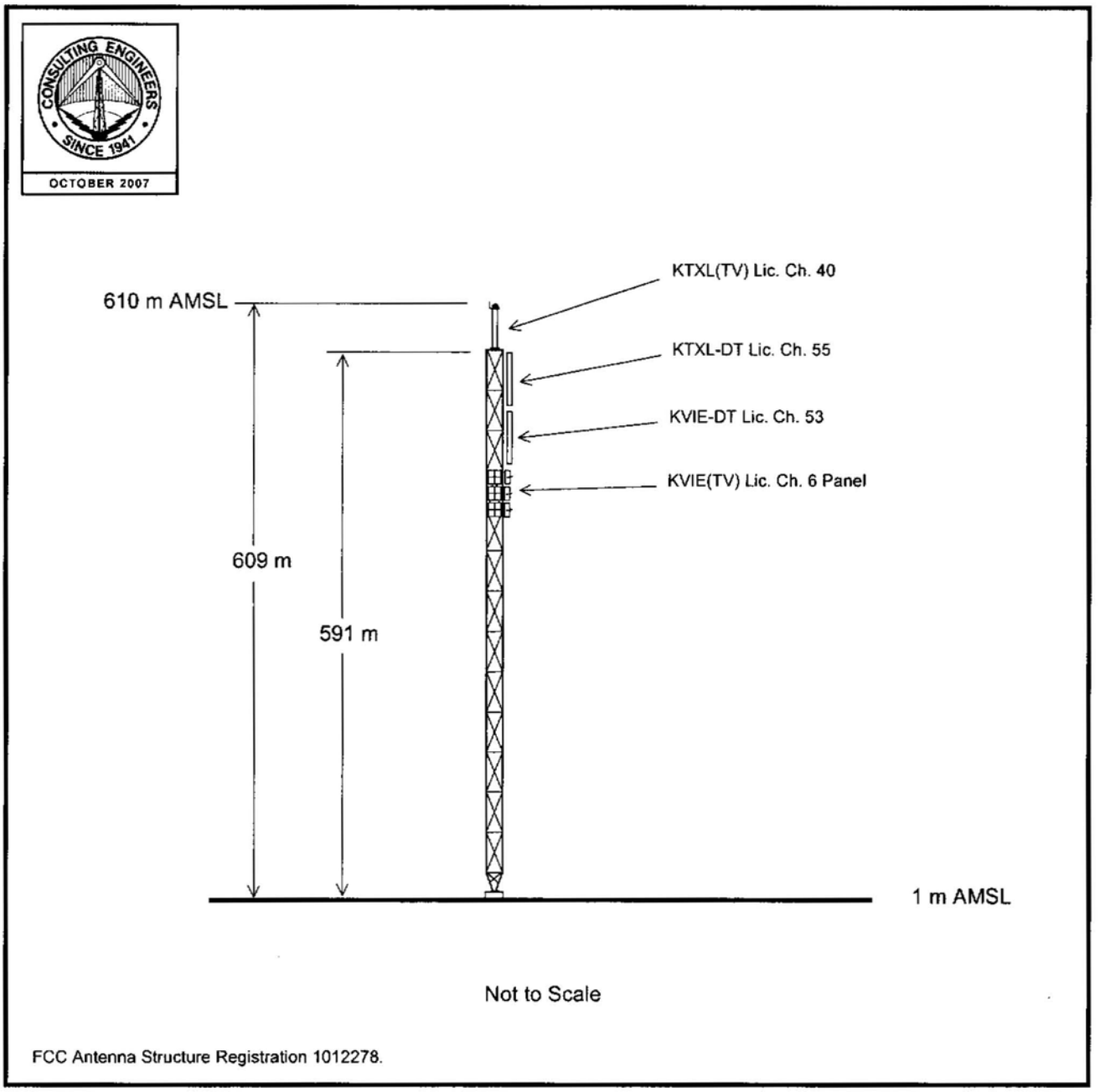
Note: display reflects rotation of 0.00°

Antenna Details:

0°	0.903	***60°***	0.729	***120°***	0.903	***180°***	0.729	***240°***	0.420	***300°***	0.470
10°	0.974	***70°***	0.675	***130°***	0.974	***190°***	0.675	***250°***	0.420	***310°***	0.570
20°	1.000	***80°***	0.657	***140°***	1.000	***200°***	0.650	***260°***	0.420	***320°***	0.650
30°	0.974	***90°***	0.675	***150°***	0.974	***210°***	0.620	***270°***	0.420	***330°***	0.675
40°	0.903	***100°***	0.729	***160°***	0.903	***220°***	0.570	***280°***	0.420	***340°***	0.729
50°	0.812	***110°***	0.812	***170°***	0.812	***230°***	0.470	***290°***	0.420	***350°***	0.812

Standard Pattern:

Last Change Date:



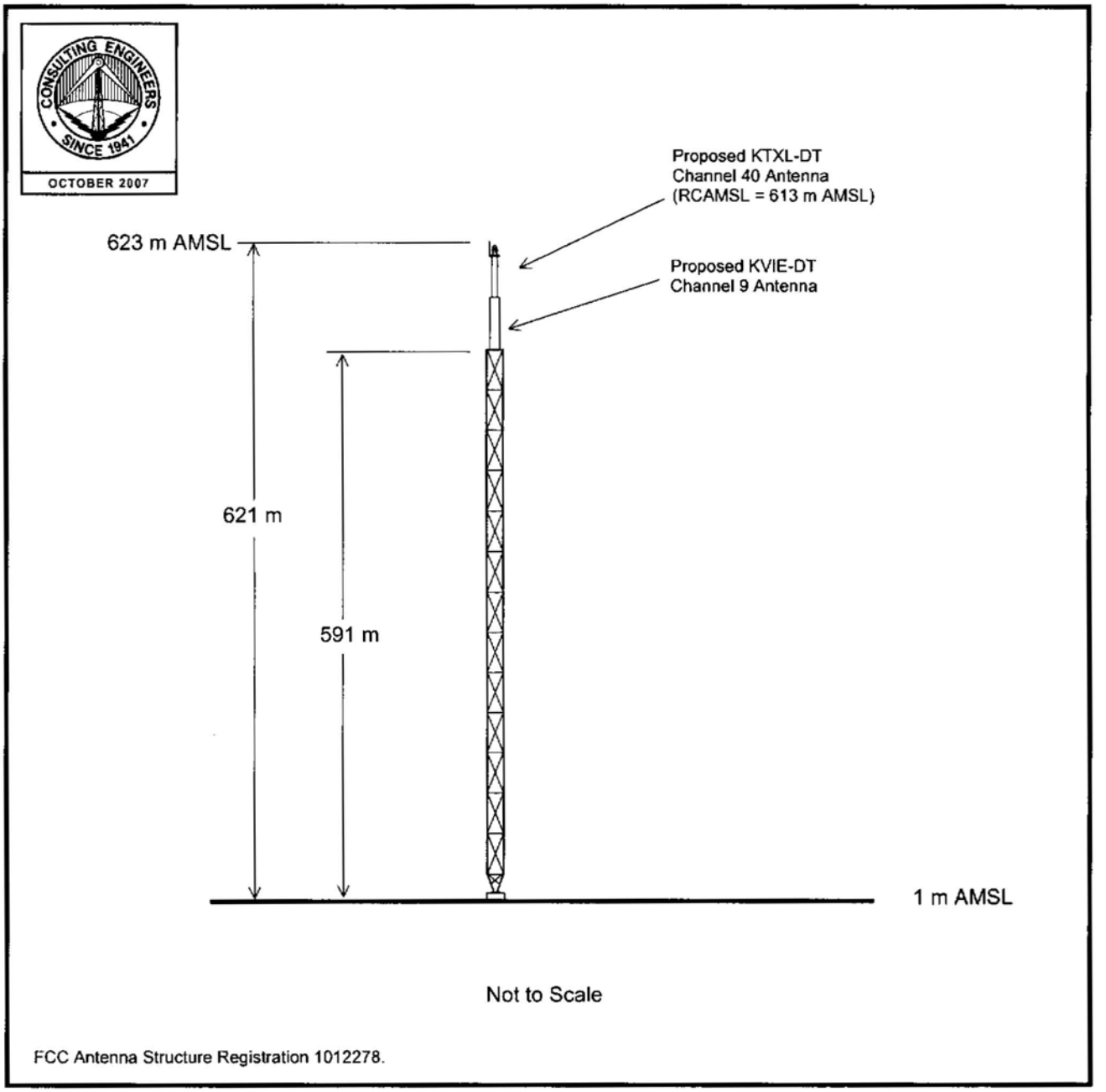
KTXL ANTENNA STRUCTURE AS PRESENTLY CONFIGURED

TELEVISION STATION KTXL-DT

SACRAMENTO, CALIFORNIA

CHANNEL 40

du Treil, Lundin & Rackley, Inc. Sarasota, Florida



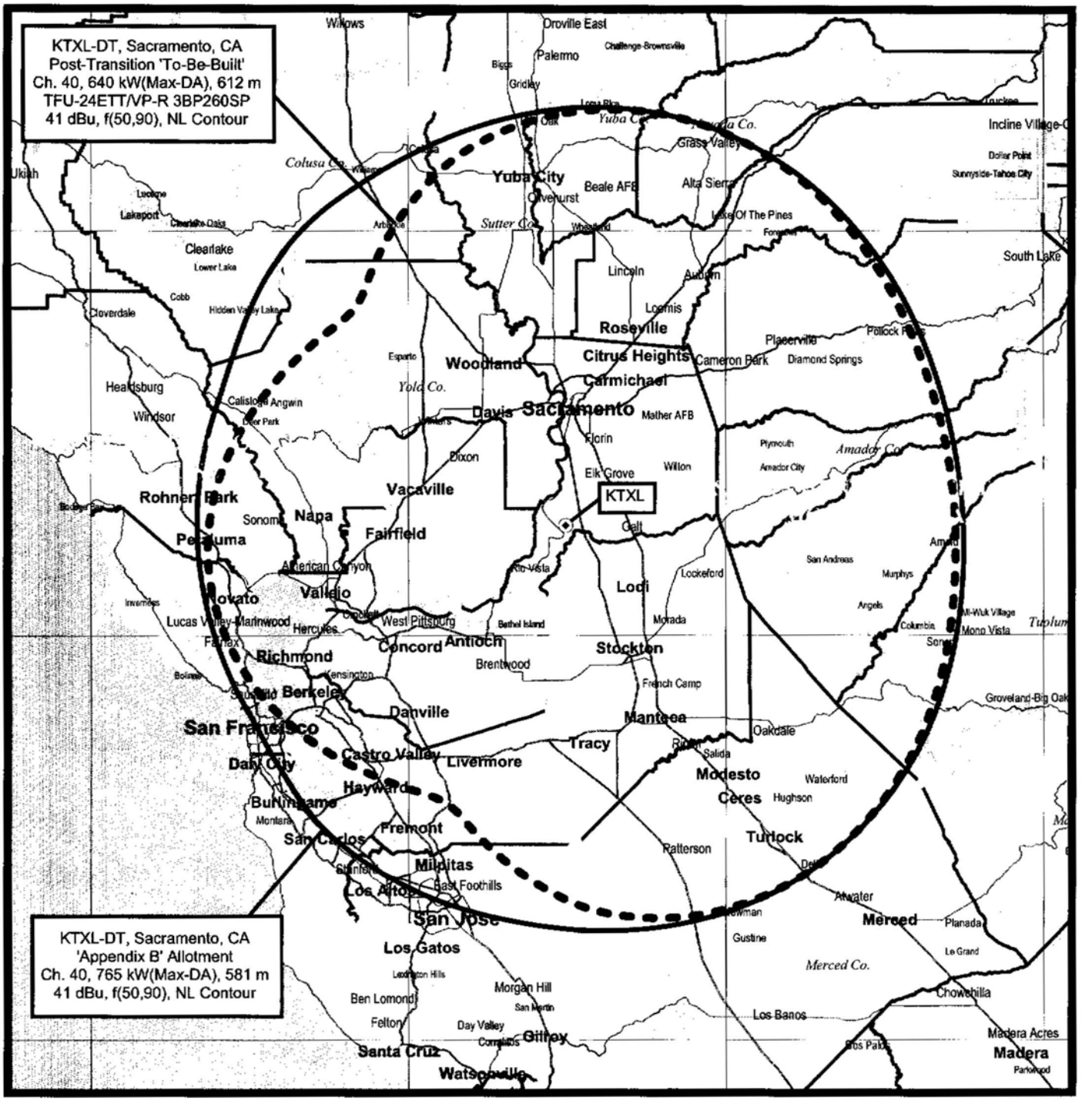
PROPOSED POST-TRANSITION ANTENNA STRUCTURE

TELEVISION STATION KTXL-DT

SACRAMENTO, CALIFORNIA

CHANNEL 40

du Treil, Lundin & Rackley, Inc. Sarasota, Florida



PREDICTED COVERAGE CONTOURS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida